

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE	:	CHAPTER 11
	:	
KRW HOLDINGS LLC,	:	
	:	CASE NO. 23-57244-SMS
	:	
DEBTOR.	:	
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	:	
MARY IDA TOWNSON,	:	
UNITED STATES TRUSTEE, REGION 21,	:	
	:	
MOVANT,	:	
	:	
-vs-	:	CONTESTED MATTER
	:	
KRW HOLDINGS LLC,	:	
	:	
RESPONDENT.	:	

**UNITED STATES TRUSTEE’S MOTION TO DISMISS CASE**

Mary Ida Townson, United States Trustee for Region 21, in furtherance of the administrative responsibilities imposed by 28 U.S.C. § 586(a), moves the Court to dismiss this case for cause pursuant to 11 U.S.C. § 1112(b) and shows as follows.

1. On July 31, 2023, KRW Holdings LLC (“Debtor”) commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Petition”).

2. Michele Keaton signed the Petition as Owner of the Debtor.

3. A search of the Georgia Secretary of State website conducted on August 18, 2023, revealed that Michele Keaton is listed as the registered agent of the Debtor and that

the Debtor last filed its annual registration in 2022.

4. Debtor filed a notice of intent to administratively dissolve with the Georgia Secretary of State on June 16, 2023.

5. The Petition was not signed by an attorney representing the Debtor.

6. It appears on the face of the petition that Debtor is an artificial entity and that it is not represented by an attorney.

7. Because Debtor is an artificial entity, it cannot represent itself in this proceeding, nor may its officers appear before this court on its behalf unless they are licensed attorneys. *See Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385 (11th Cir. 1985); *National Indep. Theatre Exhibitors, Inc. v. Buena Vista Distrib. Co.*, 748 F.2d 602, 609 (11th Cir. 1984).

WHEREFORE, the United States Trustee respectfully moves the Court to dismiss this case and grant such other relief as the Court deems just and proper.

MARY IDA TOWNSON  
UNITED STATES TRUSTEE  
REGION 21

/s/  
Alan Hinderleider  
Trial Attorney  
Georgia Bar No. 938543  
Office of the United States Trustee  
362 Richard Russell Building  
75 Ted Turner Drive, SW  
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### CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *United States Trustee's Motion to Dismiss Case* using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

- **Lisa F. Caplan** lcaplan@rlselaw.com,  
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I further certify that on this day, I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each.

KRW Holdings LLC  
Apt 4507  
55th NE 5th Street  
Miami, FL 33132

\_\_\_\_\_/s/  
Alan Hinderleider  
Georgia Bar No. 938543  
United States Department of Justice

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